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C27945935

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June

Ms. Saare – Edmonds.

While the objectives the DWR hopes to achieve with the new proposed changes in the MWELD legislation is admirable, I strongly object to how you hope to achieve them for several reasons.

1. The math does not work.
2. The current IE requirement of 71% is not impossible to achieve, but it is not easy either.
3. Decreasing the precipitation rate to 0.75inch/Hr forces a straight jacket upon every situation.
4. I support Rainbird Corporation's objections to the new rules. I'm sure other significant players are equally opposed to this.

When you make a law's objectives impossible to achieve, you will invite widespread disrespect, fraudulent testing and stoppage of important construction projects throughout the State. Your objectives are achievable on several other fronts:

1. Decreasing the plant factor (ETAF) is achievable.
2. Soil structure/soil health: good soils will enhance water retention in a *significant* fashion.
3. Rainbird's point regarding SMART controllers is spot on.
4. Collection of commercial sites air-conditioning condensate and utilizing it for irrigation purposes can have a significant impact on grid water usage.
5. Grey water harvesting can just about remove many sites off grid in terms of potable water use for irrigation purposes.
6. Broaden architectural code to mandate on-site water capture and utilization for irrigation.

The technology for pts 4-6 is here.

In general we have supported your efforts. Greater efficiencies have been achieved. I echo Aquasave president Bob Simpson's recommendation that *"...requirements for reporting of water use post-installation should be reviewed since this is where the most significant savings can be made as highlighted by the City of Lake Forest where water budgets are strictly enforced."*

Much as the State now requires a periodic smog test for all vehicles, the State should require an annual check on the efficiency of installed systems. As a designer of a good number of systems, many of us wince how quickly systems degrade because proper care is not exercised in their maintenance.
Sincerely

John Oudyk, CWM, CLIA, Aquasave member.